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The Honorable Richard A. Jones

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

JESSICA BENTON, SHELBY BRYANT,  
ANNE MARIE CAVANAUGH, AND  
ALYSSA GARRISON

Plaintiffs,  
vs.  
CITY OF SEATTLE,  
Defendant

Case No. 2:20-cv-01174-RAJ

**AALIAH CONDON DECLARATION  
IN SUPPORT FOR MOTION FOR  
PRELIMINARY INJUNCTION**

I, Aaliah Condon, declare and state as follows:

1. I was present at Cal Anderson Park in the Capitol Hill neighborhood of Seattle, WA, on December 18, 2020.
2. Seattle Police Department (SPD) was effectuating a sweep of the encampment, alongside the Seattle Parks Department.
3. SPD officers were dressed in full riot gear, accompanied by SWAT and multiple large, militarized vehicles.

DECLARATION IN SUPPORT OF MOTION FOR  
PRELIMINARY INJUNCTION - 1

2:20-cv-01174-RAJ

**SMITH LAW, LLC**  
4301 NE 4th St.  
PO Box 2767  
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Tel: (206) 715-4248  
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- 1 4. A barricade had been built around the park to protect the encampment.
- 2 5. A crowd of protestors stood inside the barricade and were approached by SPD
- 3 officers.
- 4 6. SPD officers announced a dispersal order and began aggressively deploying
- 5 pepper balls as soon as they entered the barricade.
  - 7 a. They shot these pepper balls within a few feet of the front line of the
  - 8 crowd.
  - 9 b. The whole in the barricade—where officers were standing—was the only
  - 10 exit.
- 11 7. The group was pushed up against the barricade, unable to disperse in compliance
- 12 with SPD's order.
  - 13 a. SPD officers continued to push the group back.

14 EXECUTED this 22<sup>nd</sup> day of December 2020 in Seattle, Washington.

15 I declare under penalty of perjury under the laws of the United States and the State  
16 of Washington that the foregoing is true and correct.

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22 By: \_\_\_\_\_  
Aaliah Condon, Declarant

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28 DECLARATION IN SUPPORT OF MOTION FOR  
PRELIMINARY INJUNCTION - 2

2:20-cv-01174-RAJ

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 22, 2020 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

I declare under penalty of perjury under the laws of the United States of America  
the foregoing is true and correct.

Dated this 22<sup>nd</sup> day of December 2020 at Seattle, Washington.

J. Talitha Hazelton

CERTIFICATE OF SERVICE

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